

REDACTED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THOMAS LAUMANN,)	
ROBERT SILVER, GARRETT TRAUB,)	
And DAVID DILLON, representing)	
themselves and all others similarly situated,)	
Plaintiffs)	CA No. 12-1817 (SAS)
v.)	ECF Case
NATIONAL HOCKEY LEAGUE, <i>et al.</i>)	
Defendants)	
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FERNANDA GARBER, MARC LERNER,)	
DEREK RASMUSSEN, ROBERT SILVER,)	
GARRETT TRAUB, and PETER HERMAN,)	
representing themselves and all others similarly)	
situated,)	
Plaintiffs)	CA No. 12-3704 (SAS)
v.)	ECF Case
OFFICE OF THE COMMISSIONER OF)	
BASEBALL, <i>et al.</i>)	
Defendants)	
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SUPPLEMENTAL DECLARATION OF JANUSZ A. ORDOVER

1. My name is Janusz A. Ordover. I submitted a declaration in this matter on November 12, 2014 (“Ordover Declaration”), in which I set forth my opinions concerning the absence of common impact and the fundamental flaws in the impact and damages analysis of Plaintiffs’ expert Dr. Roger Noll, and otherwise responding to Dr. Noll’s declarations (the “Noll Declaration” of February 18, 2014, and the “Noll Supplemental Declaration” of September 19, 2014).¹

2. I submit this declaration in response to the declaration of Dr. Noll, submitted on December 29, 2014 (“Noll Reply Declaration”), which reflects his third model of impact and damages.

3. My principal opinions and conclusions, as set forth in my prior declaration, as to the absence of common impact and the fundamental flaws in Dr. Noll’s models of impact and damages are unchanged by the Noll Reply Declaration or by his third model. Below I discuss certain updated analyses that I have performed.

4. Exhibits IV.1, IV.2, and VI.2 to my prior declaration summarize the results of my analyses that demonstrated the absence of common impact using Dr. Noll’s second model. Exhibits 1, 2, and 3 to this declaration summarize the results of the same analyses but using Dr. Noll’s third model. Based on these results, my conclusions remain unchanged that the BFW League Package price would be higher than the OMP price in the actual world and that Dr. Noll’s analysis fails to demonstrate common impact.

5. Like Dr. Noll’s earlier models, his third model does not provide a reliable methodology for assessing damages and impact from the challenged conduct. Among other things, it conflates the price effect of the challenged territorial exclusivity with the price effect of

¹ This declaration adopts the same definitions and terminology as in the Ordover Declaration.

content exclusivity, which Plaintiffs do not challenge.

6. I previously opined that the predictions of demand for RSN standalone offerings in Dr. Noll's second model were implausible and skewed his results.² Exhibits 4 and 5 to this declaration show predictions made by Dr. Noll's third model. These results show that Dr. Noll's third model also yields implausible predictions, including implausible predictions about the demand by the three subscriber types that Dr. Noll models.³

7. Dr. Noll's third model introduces price competition among RSN standalone offerings in the BFW. But that competition, and the intensity of that competition assumed by Dr. Noll's third model, is not supported by viewership data or any other empirical evidence. In fact, my analysis of the OMP viewership data indicates that OMP subscribers tend not to consider live telecasts of games not involving their favorite team as close substitutes for the live game telecasts involving their favorite team.⁴ The unfounded assumptions by Dr. Noll's third model about competition in the BFW provide yet another indication that the model is unreliable.

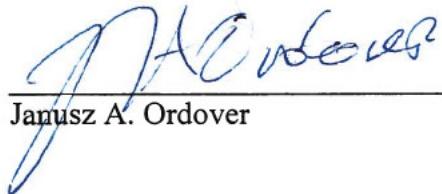
² See Ordover Declaration ¶¶ 75-81.

³ See Noll Reply Declaration at 37 (dividing consumers into three categories: (i) 1-RSN fans, "who are interested in only one RSN/team" and "derive no value from watching any RSN other than their favorite;" (ii) 2-RSN fans, "who are fans of two RSNs" for whom "all other RSNs viewing time produces no value"; and (iii) "fans of the game," who are "interested in at least three teams, and perhaps more").

⁴ See Ordover Declaration ¶¶ 57-61.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2 day of February, 2015.



A handwritten signature in blue ink, appearing to read "Janusz A. Ordover". The signature is fluid and cursive, with a horizontal line underneath it.

Janusz A. Ordover

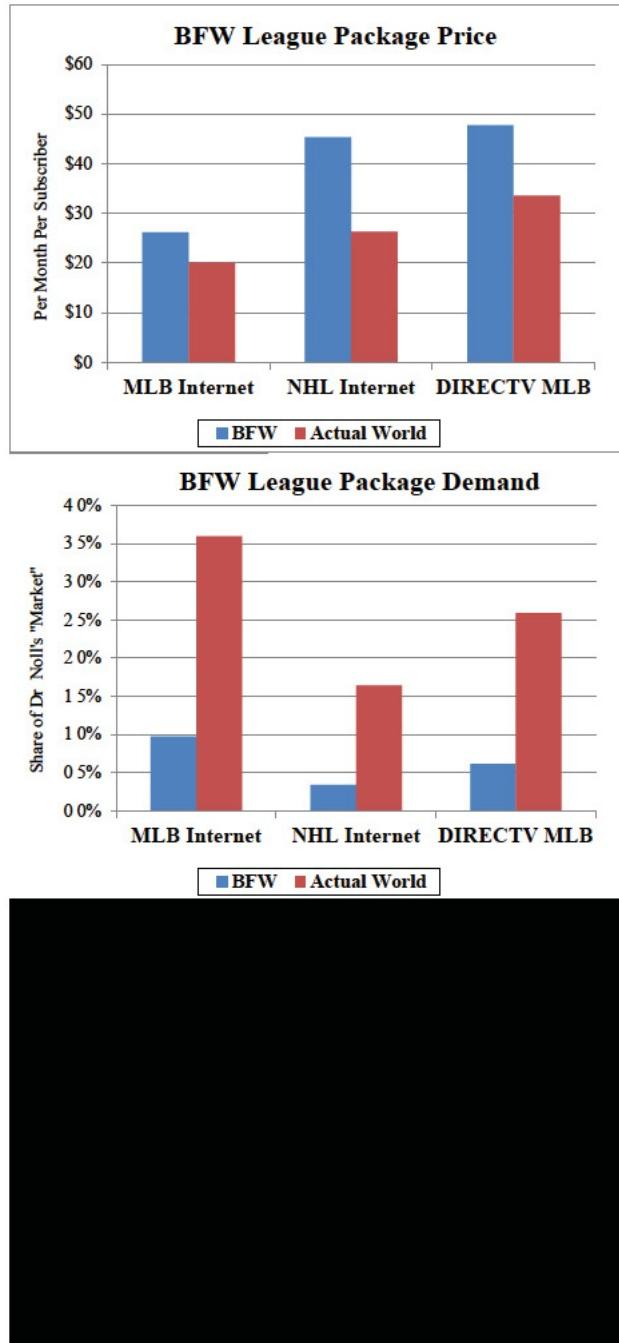
EXHIBITS

Exhibit 1: Decentralized RSN-League Negotiations over RSN Feed Fee in the BFW*

		MLB Internet RSN Feed Fee in BFW							NHL Internet RSN Feed Fee in BFW							DIRECTV MLB RSN Feed Fee in BFW																	
		\$0.15	\$0.16	\$0.17	\$0.18	\$0.19	\$0.20	\$0.21	\$0.22	\$0.23	\$0.24	\$0.25	\$0.25	\$0.26	\$0.27	\$0.28	\$0.29	\$0.30	\$0.31	\$0.32	\$0.33	\$0.34	\$0.35	\$0.30	\$0.31	\$0.32	\$0.33	\$0.34	\$0.35				
% of RSN-League feed fee negotiations for which increasing the RSN feed fee by \$0.01 increases the sum of the profits of the individual RSN and the League		100%	100%	100%	97%	93%	87%	63%	53%	43%	40%	33%																					

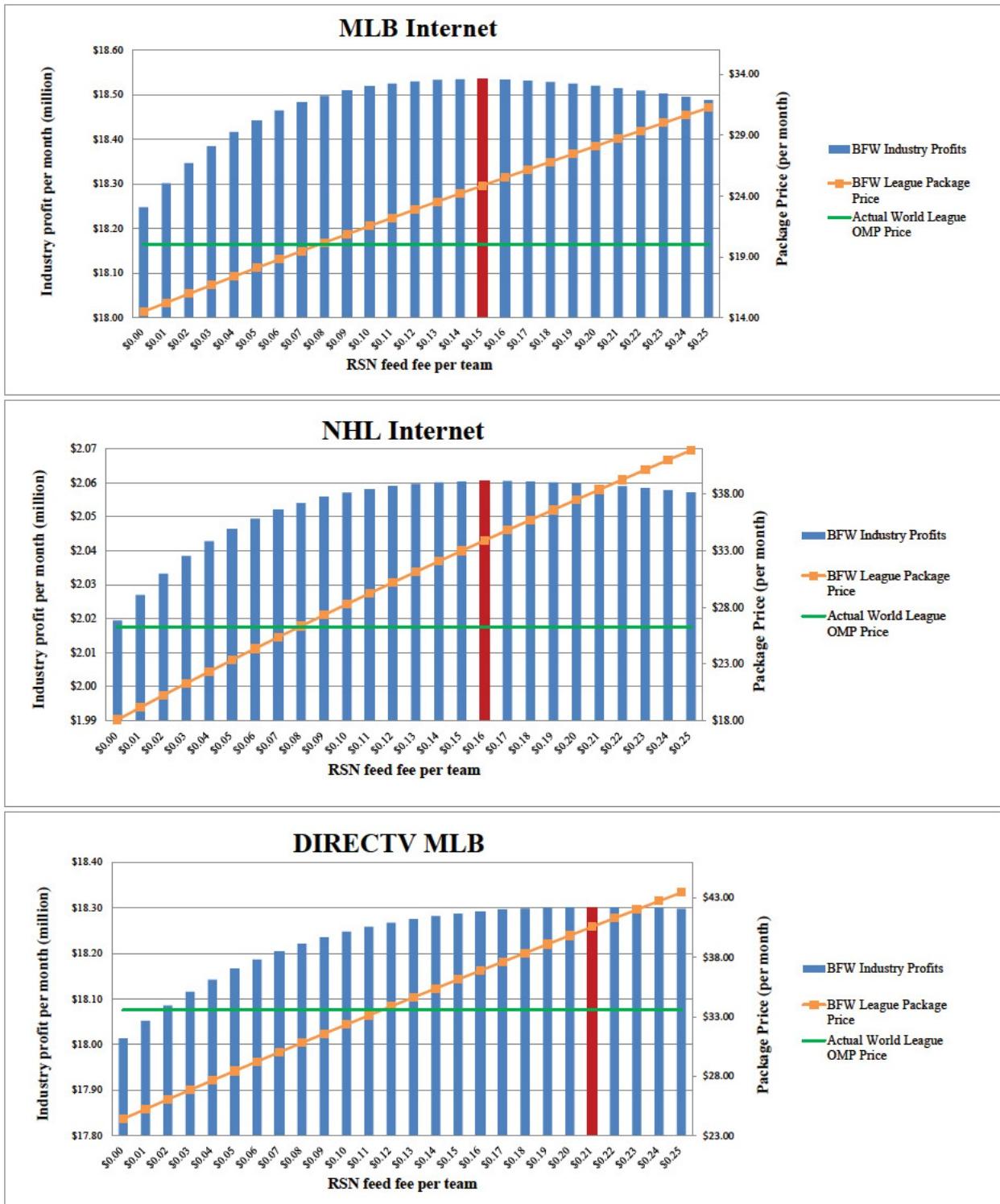
* Based on Dr. Noll's model predictions of the BFW but with the marginal costs adjusted to reflect the RSN feed fee.

Exhibit 2: BFW League Package Prices, Demand, and Revenues* with Decentralized Negotiations Minimum RSN Feed Fees



* Based on Dr. Noll's model predictions of the BFW but with the marginal costs adjusted to reflect the RSN feed fee. MLB Internet RSN feed fee: \$0.17, NHL Internet RSN feed fee: \$0.29, DIRECTV MLB RSN feed fee: \$0.31 per team per month per subscriber. The displayed amounts are comparable to Exhibits 2A, 2B, and 2C of the Noll Reply Declaration.

Exhibit 3: BFW Pricing and Profit Implications of Alternative RSN Feed Fees



Note: Dr. Noll assumes that the per subscriber BFW license fee is \$0.00.

Exhibit 4A. MLB Internet Noll Reply Model BFW Market Shares by Subscriber Type*

Team	1-RSN	2-RSN	"Fan of the game"
Angels (Los Angeles)	0.27%	0.50%	1.31%
Astros (Houston)	0.04%	0.12%	1.59%
Athletics (Oakland)	0.16%	0.34%	1.47%
Blue Jays (Toronto)	0.12%	0.26%	1.68%
Braves (Atlanta)	0.47%	0.66%	1.05%
Brewers (Milwaukee)	0.11%	0.23%	1.63%
Cardinals (St. Louis)	0.41%	0.63%	1.13%
Cubs (Chicago)	0.23%	0.46%	1.34%
Diamondbacks (Arizona)	0.10%	0.23%	1.61%
Dodgers (Los Angeles)	0.52%	0.78%	1.07%
Giants (San Francisco)	0.44%	0.62%	1.17%
Indians (Cleveland)	0.12%	0.25%	1.59%
Mariners (Seattle)	0.14%	0.26%	1.56%
Marlins (Miami)	0.08%	0.19%	1.66%
Mets (New York)	0.28%	0.48%	1.24%
Nationals (Washington)	0.21%	0.44%	1.32%
Orioles (Baltimore)	0.25%	0.44%	1.29%
Padres (San Diego)	0.11%	0.23%	1.64%
Phillies (Philadelphia)	0.49%	0.72%	1.14%
Pirates (Pittsburgh)	0.19%	0.38%	1.43%
Rangers (Texas)	0.22%	0.39%	1.29%
Rays (Tampa Bay)	0.17%	0.36%	1.48%
Red Sox (Boston)	0.64%	0.91%	0.99%
Reds (Cincinnati)	0.21%	0.35%	1.39%
Rockies (Colorado)	0.07%	0.17%	1.70%
Royals (Kansas City)	0.07%	0.16%	1.64%
Tigers (Detroit)	0.46%	0.70%	1.15%
Twins (Minnesota)	0.14%	0.29%	1.56%
White Sox (Chicago)	0.18%	0.33%	1.45%
Yankees (New York)	0.99%	1.33%	0.77%
Bundle	3.79%	3.05%	0.49%
Total Share	11.66%	16.25%	41.80%
Bundle/Total Share	32.50%	18.77%	1.17%
Subscriber Type % of Market	21.22%	39.45%	39.34%

* The reported market shares are based on purchases for each subscriber type predicted by Dr. Noll's third model (baseline BFW assumptions) out of total subscribers of that type.

Exhibit 4B. NHL Internet Noll Reply Model BFW Market Shares by Subscriber Type*

Team	1-RSN	2-RSN	"Fan of the game"
Ducks (Anaheim)	0.15%	0.25%	0.84%
Bruins (Boston)	0.22%	0.34%	0.64%
Sabres (Buffalo)	0.21%	0.31%	0.72%
Hurricanes (Carolina)	0.14%	0.23%	0.94%
Flames (Calgary)	0.17%	0.26%	0.92%
Blackhawks (Chicago)	0.22%	0.36%	0.57%
Blue Jackets (Columbus)	0.10%	0.19%	1.06%
Avalanche (Colorado)	0.14%	0.24%	0.94%
Stars (Dallas)	0.15%	0.21%	0.83%
Red Wings (Detroit)	0.28%	0.38%	0.45%
Oilers (Edmonton)	0.17%	0.26%	0.96%
Panthers (Florida)	0.15%	0.23%	0.92%
Kings (Los Angeles)	0.20%	0.30%	0.65%
Wild (Minnesota)	0.13%	0.22%	0.98%
Canadians (Montreal)	0.15%	0.26%	0.98%
Devils (New Jersey)	0.18%	0.26%	0.73%
Predators (Nashville)	0.13%	0.21%	0.96%
Islanders (New York)	0.15%	0.22%	0.87%
Rangers (New York)	0.20%	0.31%	0.64%
Senators (Ottawa)	0.13%	0.24%	1.05%
Flyers (Philadelphia)	0.26%	0.34%	0.51%
Coyotes (Arizona)	0.13%	0.23%	0.96%
Penguins (Pittsburgh)	0.28%	0.38%	0.38%
Sharks (San Jose)	0.19%	0.28%	0.75%
Blues (St. Louis)	0.17%	0.24%	0.79%
Lightning (Tampa Bay)	0.11%	0.18%	1.08%
Maple Leafs (Toronto)	0.19%	0.30%	0.82%
Canucks (Vancouver)	0.22%	0.38%	0.69%
Jets (Winnipeg)	0.12%	0.26%	1.06%
Capitals (Washington)	0.20%	0.34%	0.63%
Bundle	1.55%	1.15%	0.16%
Total Share	6.78%	9.34%	24.49%
Bundle/Total Share	22.85%	12.33%	0.67%
Subscriber Type % of Market	51.21%	21.09%	27.70%

* The reported market shares are based on purchases for each subscriber type predicted by Dr. Noll's third model (baseline BFW assumptions) out of total subscribers of that type.

Exhibit 4C. DIRECTV MLB Noll Reply Model BFW Market Shares by Subscriber Type*

Team	1-RSN	2-RSN	"Fan of the game"
Angels (Los Angeles)	0.20%	0.33%	0.97%
Astros (Houston)	0.12%	0.19%	1.00%
Athletics (Oakland)	0.18%	0.33%	0.96%
Blue Jays (Toronto)	0.14%	0.27%	1.14%
Braves (Atlanta)	0.31%	0.42%	0.75%
Brewers (Milwaukee)	0.11%	0.20%	1.15%
Cardinals (St. Louis)	0.21%	0.32%	0.90%
Cubs (Chicago)	0.17%	0.31%	0.96%
Diamondbacks (Arizona)	0.10%	0.19%	1.14%
Dodgers (Los Angeles)	0.31%	0.50%	0.80%
Giants (San Francisco)	0.20%	0.29%	0.98%
Indians (Cleveland)	0.15%	0.28%	1.03%
Mariners (Seattle)	0.11%	0.23%	1.11%
Marlins (Miami)	0.13%	0.22%	1.11%
Mets (New York)	0.21%	0.33%	0.87%
Nationals (Washington)	0.28%	0.48%	0.77%
Orioles (Baltimore)	0.22%	0.31%	0.91%
Padres (San Diego)	0.18%	0.26%	1.04%
Phillies (Philadelphia)	0.31%	0.44%	0.83%
Pirates (Pittsburgh)	0.11%	0.21%	1.11%
Rangers (Texas)	0.18%	0.28%	0.90%
Rays (Tampa Bay)	0.21%	0.36%	0.95%
Red Sox (Boston)	0.30%	0.44%	0.81%
Reds (Cincinnati)	0.18%	0.27%	0.96%
Rockies (Colorado)	0.11%	0.19%	1.16%
Royals (Kansas City)	0.10%	0.18%	1.12%
Tigers (Detroit)	0.25%	0.36%	0.90%
Twins (Minnesota)	0.13%	0.25%	1.09%
White Sox (Chicago)	0.14%	0.26%	1.03%
Yankees (New York)	0.57%	0.83%	0.52%
Bundle	2.36%	1.93%	0.32%
Total Share	8.27%	11.48%	29.26%
Bundle/Total Share	28.55%	16.80%	1.11%
Subscriber Type % of Market	42.88%	21.63%	35.49%

* The reported market shares are based on purchases for each subscriber type predicted by Dr. Noll's third model (baseline BFW assumptions) out of total subscribers of that type.

Exhibit 5A. MLB Internet Noll Reply Model Market Shares and Profits^{}**

Team	Price *	Market Share					Profit *
		1-RSN Type	2-RSN Type	Fan of the Game	All Types		
Angels (Los Angeles)	\$20.05	0.09%	0.18%	0.62%	0.34%	\$750,777	
Astros (Houston)	\$20.05	0.01%	0.04%	0.59%	0.25%	\$557,356	
Athletics (Oakland)	\$20.05	0.05%	0.12%	0.63%	0.30%	\$679,523	
Blue Jays (Toronto)	\$20.05	0.04%	0.08%	0.67%	0.30%	\$674,726	
Braves (Atlanta)	\$20.05	0.18%	0.27%	0.60%	0.38%	\$848,432	
Brewers (Milwaukee)	\$20.05	0.04%	0.07%	0.64%	0.29%	\$646,765	
Cardinals (St. Louis)	\$20.05	0.16%	0.25%	0.62%	0.37%	\$836,456	
Cubs (Chicago)	\$20.05	0.08%	0.16%	0.62%	0.32%	\$727,305	
Diamondbacks (Arizona)	\$20.05	0.03%	0.08%	0.64%	0.29%	\$646,200	
Dodgers (Los Angeles)	\$20.05	0.20%	0.32%	0.62%	0.41%	\$926,050	
Giants (San Francisco)	\$20.05	0.16%	0.24%	0.63%	0.37%	\$839,297	
Indians (Cleveland)	\$20.05	0.04%	0.08%	0.64%	0.29%	\$652,023	
Mariners (Seattle)	\$20.05	0.04%	0.09%	0.63%	0.29%	\$653,178	
Marlins (Miami)	\$20.05	0.02%	0.06%	0.63%	0.28%	\$618,419	
Mets (New York)	\$20.05	0.11%	0.17%	0.60%	0.33%	\$731,593	
Nationals (Washington)	\$20.05	0.07%	0.16%	0.61%	0.32%	\$710,443	
Orioles (Baltimore)	\$20.05	0.09%	0.16%	0.61%	0.32%	\$719,135	
Padres (San Diego)	\$20.05	0.04%	0.07%	0.65%	0.29%	\$651,333	
Phillies (Philadelphia)	\$20.05	0.19%	0.29%	0.64%	0.41%	\$910,321	
Pirates (Pittsburgh)	\$20.05	0.06%	0.14%	0.63%	0.32%	\$708,923	
Rangers (Texas)	\$20.05	0.08%	0.14%	0.59%	0.30%	\$672,883	
Rays (Tampa Bay)	\$20.05	0.06%	0.12%	0.64%	0.31%	\$694,509	
Red Sox (Boston)	\$20.05	0.26%	0.40%	0.64%	0.46%	\$1,041,436	
Reds (Cincinnati)	\$20.05	0.06%	0.12%	0.60%	0.29%	\$660,151	
Rockies (Colorado)	\$20.05	0.02%	0.05%	0.64%	0.28%	\$619,744	
Royals (Kansas City)	\$20.05	0.02%	0.05%	0.62%	0.27%	\$606,348	
Tigers (Detroit)	\$20.05	0.17%	0.28%	0.64%	0.40%	\$889,668	
Twins (Minnesota)	\$20.05	0.05%	0.09%	0.64%	0.30%	\$671,405	
White Sox (Chicago)	\$20.05	0.06%	0.11%	0.62%	0.30%	\$671,197	
Yankees (New York)	\$20.05	0.46%	0.67%	0.60%	0.60%	\$1,341,156	
Bundle	\$20.05	2.94%	2.56%	0.70%	1.91%	\$4,035,430	
Total		5.87%	7.60%	19.44%	11.89%	\$26,392,184	
Actual World Bundle	\$20.05				3.60%	\$7,592,925	

* Per month

** Based on predictions by Dr. Noll's third model if the standalone RSN offerings and the OMP were sold at the actual world OMP price. The reported market shares are based on purchases for each subscriber type predicted by Dr. Noll's third model out of total subscribers of that type.

Exhibit 5B. NHL Internet Noll Reply Model Market Shares and Profits^{}**

Team	Price *	Market Share				Profit *
		1-RSN Type	2-RSN Type	Fan of the Game	All Types	
Ducks (Anaheim)	\$26.28	0.03%	0.06%	0.24%	0.09%	\$69,938
Bruins (Boston)	\$26.28	0.05%	0.09%	0.24%	0.11%	\$83,304
Sabres (Buffalo)	\$26.28	0.05%	0.07%	0.25%	0.11%	\$79,421
Hurricanes (Carolina)	\$26.28	0.03%	0.05%	0.24%	0.09%	\$68,074
Flames (Calgary)	\$26.28	0.03%	0.05%	0.25%	0.10%	\$73,212
Blackhawks (Chicago)	\$26.28	0.06%	0.10%	0.24%	0.11%	\$84,152
Blue Jackets (Columbus)	\$26.28	0.02%	0.04%	0.24%	0.08%	\$61,420
Avalanche (Colorado)	\$26.28	0.03%	0.05%	0.24%	0.09%	\$68,287
Stars (Dallas)	\$26.28	0.03%	0.05%	0.22%	0.09%	\$65,210
Red Wings (Detroit)	\$26.28	0.09%	0.13%	0.25%	0.14%	\$102,136
Oilers (Edmonton)	\$26.28	0.04%	0.05%	0.25%	0.10%	\$73,044
Panthers (Florida)	\$26.28	0.03%	0.05%	0.24%	0.09%	\$69,633
Kings (Los Angeles)	\$26.28	0.05%	0.08%	0.23%	0.11%	\$78,375
Wild (Minnesota)	\$26.28	0.03%	0.05%	0.24%	0.09%	\$66,355
Canadians (Montreal)	\$26.28	0.03%	0.05%	0.25%	0.10%	\$70,339
Devils (New Jersey)	\$26.28	0.04%	0.06%	0.23%	0.10%	\$72,694
Predators (Nashville)	\$26.28	0.02%	0.05%	0.24%	0.09%	\$65,101
Islanders (New York)	\$26.28	0.03%	0.04%	0.23%	0.09%	\$66,272
Rangers (New York)	\$26.28	0.05%	0.08%	0.23%	0.11%	\$78,314
Senators (Ottawa)	\$26.28	0.02%	0.05%	0.25%	0.09%	\$67,515
Flyers (Philadelphia)	\$26.28	0.08%	0.10%	0.24%	0.13%	\$94,143
Coyotes (Arizona)	\$26.28	0.03%	0.05%	0.24%	0.09%	\$67,983
Penguins (Pittsburgh)	\$26.28	0.10%	0.15%	0.24%	0.15%	\$109,143
Sharks (San Jose)	\$26.28	0.04%	0.06%	0.24%	0.10%	\$75,595
Blues (St. Louis)	\$26.28	0.04%	0.05%	0.24%	0.10%	\$71,355
Lightning (Tampa Bay)	\$26.28	0.02%	0.04%	0.24%	0.08%	\$62,660
Maple Leafs (Toronto)	\$26.28	0.04%	0.07%	0.25%	0.11%	\$78,619
Canucks (Vancouver)	\$26.28	0.05%	0.09%	0.25%	0.12%	\$86,806
Jets (Winnipeg)	\$26.28	0.02%	0.05%	0.25%	0.09%	\$68,385
Capitals (Washington)	\$26.28	0.05%	0.09%	0.24%	0.11%	\$82,039
Bundle	\$26.28	1.24%	1.02%	0.28%	0.93%	\$651,249
Total Share		2.48%	2.99%	7.54%	3.99%	\$2,910,775
Actual World Bundle	\$26.28				1.64%	\$1,152,263

* Per month

** Based on predictions by Dr. Noll's third model if the standalone RSN offerings and the OMP were sold at the actual world OMP price. The reported market shares are based on purchases for each subscriber type predicted by Dr. Noll's third model out of total subscribers of that type.

Exhibit 5C. DIRECTV MLB Noll Reply Model Market Shares and Profits^{}**

Team	Price *	Market Share				Profit *
		1-RSN Type	2-RSN Type	Fan of the Game	All Types	
Angels (Los Angeles)	\$33.59	0.06%	0.10%	0.38%	0.18%	\$678,927
Astros (Houston)	\$33.59	0.04%	0.06%	0.36%	0.16%	\$586,432
Athletics (Oakland)	\$33.59	0.06%	0.10%	0.38%	0.18%	\$686,365
Blue Jays (Toronto)	\$33.59	0.04%	0.07%	0.41%	0.18%	\$663,495
Braves (Atlanta)	\$33.59	0.10%	0.15%	0.37%	0.21%	\$778,373
Brewers (Milwaukee)	\$33.59	0.03%	0.05%	0.39%	0.16%	\$613,532
Cardinals (St. Louis)	\$33.59	0.07%	0.11%	0.38%	0.19%	\$695,568
Cubs (Chicago)	\$33.59	0.05%	0.09%	0.38%	0.18%	\$666,888
Diamondbacks (Arizona)	\$33.59	0.03%	0.06%	0.39%	0.16%	\$611,365
Dodgers (Los Angeles)	\$33.59	0.10%	0.18%	0.38%	0.22%	\$812,492
Giants (San Francisco)	\$33.59	0.06%	0.09%	0.38%	0.18%	\$675,508
Indians (Cleveland)	\$33.59	0.05%	0.09%	0.39%	0.18%	\$666,814
Mariners (Seattle)	\$33.59	0.03%	0.07%	0.39%	0.17%	\$621,144
Marlins (Miami)	\$33.59	0.03%	0.06%	0.39%	0.17%	\$620,428
Mets (New York)	\$33.59	0.07%	0.11%	0.37%	0.18%	\$684,544
Nationals (Washington)	\$33.59	0.09%	0.17%	0.37%	0.21%	\$783,031
Orioles (Baltimore)	\$33.59	0.07%	0.10%	0.38%	0.18%	\$688,970
Padres (San Diego)	\$33.59	0.05%	0.07%	0.40%	0.18%	\$677,210
Phillies (Philadelphia)	\$33.59	0.11%	0.15%	0.40%	0.22%	\$820,149
Pirates (Pittsburgh)	\$33.59	0.03%	0.06%	0.39%	0.16%	\$616,090
Rangers (Texas)	\$33.59	0.06%	0.09%	0.36%	0.17%	\$639,989
Rays (Tampa Bay)	\$33.59	0.06%	0.11%	0.39%	0.19%	\$714,634
Red Sox (Boston)	\$33.59	0.10%	0.16%	0.40%	0.22%	\$822,262
Reds (Cincinnati)	\$33.59	0.05%	0.08%	0.37%	0.17%	\$640,548
Rockies (Colorado)	\$33.59	0.03%	0.05%	0.39%	0.16%	\$611,713
Royals (Kansas City)	\$33.59	0.03%	0.05%	0.38%	0.16%	\$593,551
Tigers (Detroit)	\$33.59	0.08%	0.12%	0.39%	0.20%	\$746,660
Twins (Minnesota)	\$33.59	0.04%	0.08%	0.39%	0.17%	\$646,295
White Sox (Chicago)	\$33.59	0.04%	0.08%	0.38%	0.17%	\$630,303
Yankees (New York)	\$33.59	0.24%	0.39%	0.37%	0.32%	\$1,196,844
Bundle	\$33.59	1.89%	1.68%	0.49%	1.35%	\$4,767,045
Total		3.78%	4.83%	11.97%	6.91%	\$25,657,169
Actual World Bundle	\$33.59				2.59%	\$9,163,911

* Per month

** Based on predictions by Dr. Noll's third model if the standalone RSN offerings and the OMP were sold at the actual world OMP price. The reported market shares are based on purchases for each subscriber type predicted by Dr. Noll's third model out of total subscribers of that type.